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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MASOUMEH MOTEVALLI
ALAMOUTI, individually and as
successor-in-interest to Masoud Rahmati,
deceased; and MOSHEN RAHMATI,
individually,

Plaintiffs,

v.

COUNTY OF LOS ANGELES; and
DOES 1 through 10, inclusive,

Defendants.

Case No. 2:24-cv-05560-MWC-JC

*Hon. Michelle Williams Court
Hon. Mag. Judge Jacqueline Chooljian*

**JOINT STIPULATION TO
ALLOW PLAINTIFFS TO AMEND
COMPLAINT TO NAME THE
INDIVIDUAL DEFENDANT
DEPUTIES IN PLACE OF DOE
DEFENDANTS 1-10**

*[Proposed Order filed concurrently
herewith]*

TO THIS HONORABLE COURT:

IT IS HEREBY STIPULATED by and between Plaintiffs MASOUMEH MOTEVALLI ALAMOUTI and MOSHEN RAHMATI, and Defendant COUNTY OF LOS ANGELES (“the Parties”), by and through their respective attorneys of record, as follows:

1. Plaintiffs filed their Complaint on July 1, 2024. [Dkt. 1.] At the time of the filing of their Complaint, Plaintiffs were genuinely ignorant of the names of the County of Los Angeles Sheriff’s Department employees and/or individuals who are alleged to have failed to protect or provide timely medical care to Plaintiffs’ decedent during the incident giving rise to this lawsuit. Subsequently, through discovery, Plaintiffs have discovered information that the pertinent County of Los Angeles Sheriff’s Department employees who had responsibility for the protection and welfare of Plaintiffs’ decedent during the incident giving rise to this lawsuit are believed to include Yvonne Pullen, Ryan Garcia, Briseida Nochez, Rene Aguilar Ornelas, Joel Leyva, Andrew Wise, Jason Gonzalez, Bart Marshall, Michael Maybee, and Oluwasanmi Ogunjumo.
2. The Parties agree that Plaintiffs may file an amended complaint for the purpose of naming the foregoing individuals as individual defendants, in lieu of the current fictitiously named defendants “Does 1-10,” and identifying the alleged roles and responsibilities of these individuals as regards the incident giving rise to this lawsuit.
3. A copy of Plaintiffs’ proposed First Amended Complaint is attached hereto as “Exhibit A.”
4. Counsel for the County of Los Angeles agrees to accept service of the First Amended Complaint on behalf of the County of Los Angeles.

1 5. The Parties agree that Plaintiffs shall have 7 days to file their First Amended
2 Complaint after the Court grants them leave, and that Defendant County of
3 Los Angeles shall have 21 days thereafter to file a responsive pleading.
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5 **IT IS SO STIPULATED.**
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7 DATED: April 7, 2025

LAW OFFICES OF DALE K. GALIPO

9 By: /s/ Benjamin S. Levine
10 Dale K. Galipo
11 Benjamin S. Levine¹
12 *Attorneys for Plaintiffs*
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14 DATED: April 7, 2025

COLLINS + COLLINS LLP

15 By: /s/ Chandler A. Parker
16 Tomas A. Guterres
17 Chandler A. Parker
18 *Attorneys for Defendant County of Los*
19 *Angeles*
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26 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed,
27 and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.